

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

BLANCA LUGO-GONZALEZ

V.

C.R. ENGLAND, INC. and
CECIL LAMAR DERICO

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§
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§

CIVIL ACTION NO. 1:17-cv-00073

DEFENDANTS' NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS:

Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendant, **C.R. ENGLAND, INC.**, hereby removes this action to the United States District Court for the Southern District of Texas from the 357th Judicial District Court of Cameron County, Texas, stating as follows:

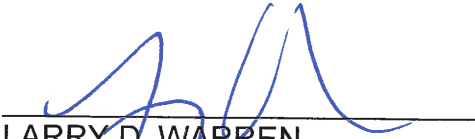
1. Plaintiff, Blanca Lugo-Gonzalez commenced this action in the 357th Judicial District Court of Cameron County, Texas, where it was given Cause No. 2017-DCL-01111. This action is between citizens of different states. Plaintiff is a resident of Texas. Defendant, CR England is a corporation, whose main office and principal place of business is located in Salt Lake City, Utah and Cecil Lamar Derico is a resident of the State of Georgia. Further, Plaintiff claims damages for serious personal injury and is seeking damages of \$1,000,000. Accordingly, this Court has original jurisdiction under 28 U.S.C. § 1332.
2. Defendant, CR England received the summons and complaint on March 6, 2017, so this removal is timely under 28 U.S.C. § 1446(b).
3. A copy of all process, pleadings, and orders served upon Defendant(s) is attached as Exhibit A.

4. Defendant has provided written notice of this Notice of Removal to all adverse parties and has filed a copy with the Clerk of the 357th Judicial District Court of Cameron County, Texas.

5. Defendants consent to the removal.

Dated: March 27, 2017

Respectfully submitted,



LARRY D. WARREN
State Bar No. 20888450
ATTORNEYS FOR DEFENDANT
C.R. ENGLAND, INC.

OF COUNSEL:

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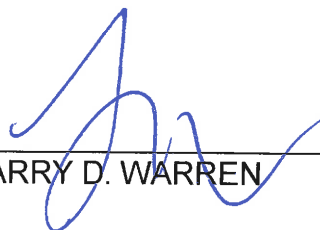
CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of April 2017, the foregoing was filed with the Clerk of Court using the CM/ECF system, and was served on counsel:

Via Facsimile: (956) 504-3674

Mary Wilson
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ATTORNEYS FOR PLAINTIFF



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